

MARY C. WICKHAM, Bar No. 145664  
County Counsel  
RODRIGO A. CASTRO-SILVA, Bar No. 185251  
Senior Assistant County Counsel  
THOMAS J. FAUGHNAN, Bar No. 155238  
Senior Assistant County Counsel  
LAUREN M. BLACK, Bar No. 192302  
lblack@counsel.lacounty.gov  
Principal Deputy County Counsel  
500 West Temple Street, Suite 468  
Los Angeles, CA 90012  
Tel: 213.974.1830 Fax: 213.626.7446

Attorneys for Defendant  
COUNTY OF LOS ANGELES

MICHAEL N. FEUER, Bar No. 111529  
City Attorney  
KATHLEEN A. KENEALY, Bar No. 212289  
Chief Assistant City Attorney  
SCOTT MARCUS, Bar No. 184980  
scott.marcus@lacity.org  
Senior Assistant City Attorney  
200 N. Main St., City Hall East, 7<sup>th</sup> Floor  
Los Angeles, CA 90012  
Tel: 213.978.4681 Fax: 213.978.7011

Attorneys for Defendant  
CITY OF LOS ANGELES

BYRON J. MCLAIN, Bar No. 257191  
bmclain@foley.com  
FOLEY & LARDNER LLP  
555 South Flower Street, Suite 3300  
Los Angeles, CA 90071-2411  
Telephone: 213.972.4500  
Facsimile: 213.486.0065

Attorney for Defendant  
COUNTY OF LOS ANGELES

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS,  
et al.,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a Municipal  
entity, et al.,

Defendants.

Case No. CV 20-02291 DOC (KES)

**DEFENDANTS' JOINT  
STIPULATION REQUESTING  
HEARING TO APPROVE BINDING  
TERM SHEET**

**JOINT STIPULATION REQUESTING HEARING ON BINDING TERM SHEET**  
Case No. CV 20-02291 DOC (KES)

1 LOUIS R. MILLER, Bar No. 54141  
MIRA HASHMALL, Bar No. 216842  
2 EMILY A. SANCHIRICO, Bar No. 311294  
MILLER BARONDESS, LLP  
3 1999 Avenue of the Stars, Suite 1000  
Los Angeles, CA 90067  
4 Email: esanchirico@millerbarondess.com  
Telephone: 310.552.4400  
5 Facsimile: 310.312.4224

6 Attorneys for Defendant  
7 COUNTY OF LOS ANGELES  
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**TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:**

Defendants City of Los Angeles and County of Los Angeles (together, “Defendants”), by and through their respective counsel, hereby stipulate to the following:

**RECITALS**

WHEREAS, on May 22, 2020, the Honorable David O. Carter issued a Preliminary Injunction directing Defendants to offer housing to people experiencing homelessness (“PEH”) camped within 500 feet of freeway overpasses, underpasses, or ramps and to humanely relocate these individuals at least 500 feet away from such areas by no later than September 1, 2020 [Dkt. 123];

WHEREAS, on May 28, 2020, Defendants filed their Joint Request of City of Los Angeles and County of Los Angeles for Order to Mediate (“Joint Request”) [Dkt. 124];

WHEREAS, on May 29, 2020, the Honorable David O. Carter granted Defendants’ Joint Request, and appointed the Honorable André Birotte Jr. to serve as the mediator [Dkt. 125];

WHEREAS, on May 29, 2020, the Honorable André Birotte Jr. issued an Order Setting Briefing Schedule and Mediation (“Scheduling Order”) [Dkt. 127];

WHEREAS, Defendants participated in a mediation with the Honorable André Birotte Jr. on Thursday, June 11, 2020 at the County of Los Angeles’ Hall of Administration and on Friday, June 12, 2020 at Los Angeles City Hall;

WHEREAS, Defendants reached agreement as a result of the mediation, and have memorialized the terms in a Binding Term Sheet, subject to the Court’s approval;

WHEREAS, an executed copy of the Binding Term Sheet has been submitted to the mediator, the Honorable André Birotte Jr.; and

WHEREAS, Defendants would like to discuss and obtain the approval of the Binding Term Sheet from the Court.

**STIPULATION**

NOW THEREFORE, IT IS HEREBY STIPULATED that Defendants jointly and respectfully request that the Court set a hearing to review and approve the Binding Term Sheet on Thursday, June 18, 2020 at 10:00 a.m., or at the Court's earliest convenience.

**IT IS SO STIPULATED.**

DATED: June 16, 2020

MARY C. WICKHAM

/s/ Lauren Black

Lauren M. Black

Principal Deputy County Counsel

COUNTY OF LOS ANGELES

DATED: June 16, 2020

MICHAEL N. FEUER, City Attorney

/s/ Scott Marcus

Scott Marcus

Senior Assistant City Attorney

CITY OF LOS ANGELES

*Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(1), Byron J. McLain hereby attests that concurrence in the filing of this document and its contents was obtained from all signatories listed above.*